

**Morin Brick Company-Lachance Division  
Cumberland County  
Gorham, Maine  
A-119-70-C-M**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #2**

After review of the Part 70 Minor Revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

**I. Registration**

**A. Introduction**

FACILITY	Morin Brick Company-Lachance Division (Morin Brick Company)
LICENSE NUMBER	A-119-70-C-M
LICENSE TYPE	Part 70 Minor Revision
SIC CODES	3251
NATURE OF BUSINESS	Brick & Structural Clay Products
FACILITY LOCATION	392 Mosher Road, Gorham

**B. Emission Equipment**

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Brick Kiln, 1K	10.7 MMBtu/hr*; 5,833 lb/hr (input)	process equipment
Brick Dryer, 1BD	6,771 lb/hr (input)	process equipment

\*Previously licensed at 20 MMBtu/hr.

Morin Brick Company has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

**C. Revision Description**

Morin Brick Company plans to convert its Gorham facility from fuel oil to natural gas. The oil burners in the brick kiln will be replaced by natural gas burners. Three different natural gas burners will be utilized in the kiln. There will be eight burners with a maximum heat input of 215,000 Btu/hr, eight burners at 343, 000

Btu/hr, and 16 burners at 387,000 Btu/hr for a total combined heat input capacity of approximately 10.7 MMBtu/hr in the kiln.

Morin Brick Company also plans to add one auxiliary burner in the duct work prior to the brick dryer to boost the temperature of the air being vented to the dryer from the cooling zone of the kiln. This burner will have a maximum heat input capacity of 2.0 MMBtu/hr and is therefore an insignificant activity per MEDEP Chapter 140, Appendix B and noted for completeness purposes only.

D. Application Classification

This amendment will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision of a Part 70 License and has been processed as such.

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>
PM	14.0	12.0	-2.0
PM <sub>10</sub>	14.0	12.0	-2.0
SO <sub>2</sub>	50.0	8.4	-41.6
NO <sub>x</sub>	20.0	4.4	-15.6
CO	15.0	15.1	0.1
VOC	5.0	4.9	-0.1
HF	18.6	18.6	0.0

E. Facility Emissions

**Total Allowable Annual Emissions for the Facility\***  
(used to calculate the license fee)

<b>Pollutant</b>	<b>Tons/Year</b>
PM	12.0
PM <sub>10</sub>	12.0
SO <sub>2</sub>	8.4
NO <sub>x</sub>	4.4
CO	15.1
VOC	4.9
Hydrogen Fluoride (HF)	18.6

\* Total facility emissions do not include emissions from insignificant activities or units designed as miscellaneous emission units.

## ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants this Part 70 License Minor Revision A-119-70-C-M subject to the conditions found in Air Emission License A-119-70-A-I and in amendment A-119-70-B-M and in addition to the following conditions.

Federally enforceable conditions in this Part 70 license minor revision must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

**The following shall replace Condition (24) of Air Emission License A-119-70-A-I and amendment A-119-70-C-M:**

(24) **Brick Kiln**

- A. Morin Brick Company is licensed to operate a brick kiln (10.7 MMBtu/hr) firing natural gas. [MEDEP Chapter 140, BPT]
- B. Morin Brick Company shall not exceed an annual natural gas fuel use cap of 108 MM scf/year (12 month rolling total) demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- C. Emissions from the brick kiln shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	2.78	MEDEP Chapter 140, BPT	-
PM <sub>10</sub>	2.78	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
SO <sub>2</sub>	1.94	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
NO <sub>x</sub>	1.02	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
CO	3.48	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
VOC	0.07	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
HF	4.24	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

- D. Morin Brick Company shall operate the brick kiln such that the visible emissions from the kiln do not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]
- E. When requested by the Department, Morin Brick Company shall conduct visible emission testing on the brick kiln in accordance with 40 CFR Part 60, Appendix A, Method 9 or other method approved by the Department. [MEDEP Chapter 140, BPT]
- F. Morin Brick Company shall maintain monthly records of brick additives (including manganese dioxide and synthetic iron oxide) indicating amounts of additive purchased and weight percent HAP. [MEDEP Chapter 140, BPT]

**Condition (26)(B) of Air Emission License A-119-70-A-I is deleted.**

**The following shall replace Condition (27) of Air Emission License A-119-70-A-I:**

**(27) Lubricant Use**

- A. Morin Brick Company shall not exceed the use of 1,300 gallons per year of distillate fuel oil or specification waste oil utilized as a lubricant during the extrusion of the brick column through the dies. [MEDEP Chapter 140, BPT]  
**Enforceable by State-only**
- B. Morin Brick Company shall maintain monthly records of gallons of distillate fuel oil or specification waste oil used as a lubricant demonstrated by purchase receipts for the supplier. [MEDEP Chapter 140, BPT]
- C. The sulfur content of the distillate fuel used as a lubricant shall not exceed 0.7% by weight. [MEDEP Chapter 140, BPT]
- D. Only oil meeting the criteria “specification” waste oil (as defined in the “Waste Oil Management Rules”) shall be used as a lubricant during brick extrusion. [MEDEP Chapter 140, BPT]

**Condition (28)(C) of Air Emission License A-119-70-A-I is deleted.**

**Condition (30) of Air Emission License A-119-70-A-I is deleted.**

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**The following are new Conditions:**

- (40) This amendment shall expire concurrently with Air Emission License A-119-70-A-I.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/4/01

Date of application acceptance: 5/4/01

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Lynn Ross, Bureau of Air Quality.